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July 17, 2003

Via US Mail and e-mail

Marianne Lamont Horinko
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

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OPTIC
2003 JUL 22 AM 11:14

**Re: Rubber and Plastic Additives (RAPA) Panel
HPV Chemical Challenge Program Submission
Substituted p-Phenylenediamines (PPD) Category
Revised Category Justification and Testing Rationale**

Dear Ms. Horinko:

The RAPA Panel of the American Chemistry Council is pleased to submit the revised test plan and robust summaries for the Substituted p-Phenylenediamines category, which includes five of the 37 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Alco Chemicals; Bayer Polymers LLC.; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

In this submission, please find the revised *Category Justification and Testing Rationale* for the category *Substituted p-Phenylenediamines*. Five chemicals in the category are sponsored in the Program, as listed in the following table:

RAPA Panel Substituted p-Phenylenediamines Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
101-96-2	p-Phenylenediamine, N,N-di-sec-butyl
3081-14-9	p-Phenylenediamine, N,N-bis(1,4-dimethylpentyl)
68953-84-4	1,4-Benzenediamine, N,N'-mixed Ph and toyl derivatives
3081-01-4	p-Phenylenediamine, N-(1,4-dimethylpentyl) N'-phenyl
15233-47-3	p-Phenylenediamine, N,(1-methylheptyl)-N'-phenyl,



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Page 2 of 2

Data for two additional chemicals in the category, listed in the table below, are used to support the conclusions reached for the category.

RAPA Panel Substituted p-Phenylenediamines Category Additional Chemicals in the Category	
CAS Number	Compound Name
101-72-4	p-Phenylenediamine, N-Isopropyl-N'-phenyl-,
793-24-8	p-Phenylenediamine, N-(1,3-dimethylbutyl) N'-phenyl

In addition to the revised *Category Justification and Testing Rationale*, please also find attached revised robust summaries contained in IUCLID-formatted documents for each of the five sponsored chemicals and the two supporting chemicals in the category. These documents are revisions of documents submitted to EPA on December 18, 2001. In preparing the revised *Category Justification and Testing Rationale* and the revised robust summaries, comments received from EPA (dated November 5, 2002) and from Environmental Defense (dated May 15, 2002) have been considered.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments